

**UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

AMERICAN SALES & MANAGEMENT )  
ORGANIZATION, LLC d/b/a )  
EULEN AMERICA, )

Petitioner, )

v. )

Case No. 18-1342

NATIONAL LABOR RELATIONS )  
BOARD, )

Respondent. )

**PETITIONER'S STATEMENT OF ISSUE TO BE RAISED**

The Petitioner, American Sales & Management Organization, LLC, d/b/a Eulen America, by and through undersigned counsel, hereby submits the following statement of issue to be raised.

**1.** Whether the National Labor Relations Board erred in determining that the Petitioner is not under the jurisdiction of the Railway Labor Act because it is not directly or indirectly controlled by an airline carrier.

Dated: **January 29, 2019.**

Respectfully submitted,

/s/ Brian Koji

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### **CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2019, I electronically filed the foregoing document with the Clerk for the United States Court of Appeals for the District of Columbia Circuit using CM/ECF. I also certify that the foregoing document is being served this 29th day of January 2019 on all counsel of record and individuals identified on the Service List in the manner specified, either via transmission of Notice of Electronic Filing generated by CM/ECF, via electronic mail, or in some other authorized manner for those counsel or individuals who are not authorized to receive electronically Notices of Electronic Filing.

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